

Appendix B. Analysis of Scoping Comments for the Swauk Pine Project

Issue Statement	Scoping Reference No.	Specific and Representative comments	IDT Response	Measures to Track	EA reference page
1) Proposed road and trail actions may affect many types of public use. Uses include driving, mining, OHV trails, dispersed camping, mushroom gathering, winter recreation, and eligibility or status of lands designated for Potential Wilderness Area or Inventoried Roadless Area.	Proposed closures and decommissioning of roads and trails would restrict access to 4X4 trails and reduce 4X4 recreation opportunities.				
	1, 5, 11, 16, 18.5, 19, 26, 28, 32, 33, 38, 39	<div>◦Proposed road closures or decommissioning may eliminate access to popular 4X4 trails, reducing opportunities for the 4wd user group.</div> <div>◦Specifically, how will OHV trails 4W332, 4W334, and 4W339 be affected?</div> <div>◦access to the Billy goat Gulch and Lion Gulch 4WD trails has already been greatly restricted by the closure at Lion gulch Creek crossing of 9712113. Closure of the 9712209, 9712210, 97122114 would further restrict access to these areas.</div> <div>◦closing 9712621 would completely eliminate the north end of 4WD 334 (Hole in the Rock Trail);</div> <div>◦The proposed action would slowly shut down one of the few 4WD trail systems in the state.</div> <div>◦Closing roads/restricting access will reduce recreational opportunities.</div> <div>◦several of the spur roads proposed for closure should be considered for conversion to trail so they remain open to continued use by recreationists (without the expense of road maintenance). Discuss reasons for closure of each spur, and describe the features of interest to recreationists to which they currently lead.</div> <div>◦reconsider proposal to decommission or place the following in storage (no use), because they appear to tie into or connect with a major (ML-3) road. 9712113, 9712114, 9712124, and 9712126;</div>	Address with No Action alternative; also consider alternative with more road to trail conversions; include table displaying rationale for closing system roads. Explain rationale for decommissioning system trails (duplicate route on 334, relocations on 4WD 339; Add required mitigation to leave short parking spurs	Net change in miles of system road and system trail; net change to overall footprint of roads and trails; Change in no. of access points for 4X4 trails	<div>◦Actions on specific trails: EA page x.</div> <div>◦Table with rationale for closure or decommissioning: EA page x.</div> <div>◦Required Mitigation: EA page x.</div> <div>◦Overall effects on 4X4 opportunities: EA page x.</div> <div>◦Alternative with more road-to-trail conversion, EA page x.</div> <div>◦Access points for 4X4 trails: EA page x.</div>
	Proposed road closure and decommissioning would reduce or eliminate dispersed camping opportunities.				
	4, 5, 34	<div>◦Closing spur roads may reduce opportunities for camping. Where will displaced campers go?</div> <div>◦Proposed action would eliminate dispersed camping sites along Lion and Cougar Gulch Creeks.</div>	Add mitigation (leave short spurs for parking along Lion Gulch and Cougar Gulch Creeks); describe impacts to dispersed camping opportunities.		EA page x.
	Proposed road closure and decommissioning would reduce or eliminate dispersed camping opportunities.				
	11, 19, 22	Proposed road closures make areas inaccessible to hikers and horseback riders which are not typically destructive activities.	Address with No Action alternative;		EA page x.
	Proposed road closures would reduce hunting and sight-seeing opportunities, and access for those with limited physical abilities..				
	11, 48	Proposed road closures will eliminate roads used by hunters and sightseers and the elderly with limited physical abilities.	Address with No Action alternative;		EA page x.
	Proposed road closures would affect egress during a fire, and make it harder to suppress fires;				
	4, 9, 10, 12, 22, 29, 31, 37, 43	<div>◦Closing spur roads may make it harder to fight a fire. We need as many roads as possible.</div> <div>◦Around Liberty Mtn Homes, proposed road closures may reduce opportunities for rapid egress during a fire. Need multiple egress routes.</div> <div>◦Proposed closure of Hawk Rd (9712-116) would eliminate an alternative fire escape route for Liberty Mountain Owners, and would cause us to have to relocate the road onto hilly terrain, possibly causing more erosion than the current road.</div> <div>◦Closing roads and restricting access in response to fire is completely unacceptable.</div>	Non-issue (no closure of system roads and trails proposed around LMOA - would not affect egress); check 9712-116		EA page x.
	Proposed road closures would reduce access to public lands and are therefore contrary to the Organic Act.				
	5, 6, 22	<div>◦The proposed action would reduce or eliminate access to public lands, which is unacceptable.</div> <div>◦Under the Organic Act, no rule or regulation shall prohibit any person from entering upon the national forest for all proper and lawful purposes -- the proposed closure of traditionally used roads in this forest would harm that intent.</div>	Address with No Action alternative, and clarify how Forest Service complies with all applicable laws.		EA page x.
	Proposed road closures would reduce access for future for management of the Forest.				
	6, 17	<div>◦Proposed road closures are not needed to restore the forest. Citizens have not destroyed this forest -- insects and neglect have.</div> <div>◦Proposed road closures may reduce opportunities for future management of the forest.</div>	NI (opinion);		EA page x.
	Proposed road closures do not consider law enforcement needs, or effects on search and rescue capability.				
	22	Proposed road closures do not consider needs of County Law Enforcement, or search and rescue.	Non-issue (beyond scope of project)		
	Proposed road closures would reduce or eliminate roads needed for mining.				
	3, 18.5, 19, 20, 22, 24, 33	<div>◦Proposed action will <u>take away opportunities for mining in Upper Williams Creek.</u></div> <div>◦Proposed road closures will reduce opportunities for mining in one of the few gold-producing areas in Washington.</div> <div>◦You are closing down my mining access road, the only one I have left.</div> <div>◦closing mining access roads is a violation of General Mining Law of 1872, Organic Act of 1897, the Transfer Act of 1905, the Multiple Use Act of 1955, the Mining and Minerals Act of 1970. All have perfectly clear language "excepting" prospecting and mining activities. Your rules, regulations, policies, practices and closing of these roads does not support the original intent of these statutes. A mining claim is a vested interest in real property.</div>	Non-issue. Can addres with mitigation to reduce impacts to those who have submitted Plans of Operation that are awaiting FS approval, and by dropping proposed actions on RS2477 roads.		EA page x.
	Proposed closure of RS2477 mining roads and mine-to-market roads would be illegal.				

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1) cont'd. Proposed road and trail actions may affect many types of public use. Uses include driving, mining, OHV trails, dispersed camping, mushroom gathering, winter recreation, and eligibility or status of lands designated for Potential Wilderness Area or Inventoried Roadless Area.	4, 19, 20, 22	oProposed action may affect roads that are mine to market, and may not be legal to close. oRS2477 mining access roads are not unauthorized or illegal.	Modify proposed action - drop proposed actions on RS2477 roads and label as non-system on maps.		EA page x.
	Decommissioning roads won't reduce maintenance expenditures -- the Forest Service has not been spending money to maintain roads.				
	11	Road decommissioning to save maintenance dollars is inappropriate. There has not been much maintenance here in the last 15 years.	Non-issue (opinion).		
	All road closures would be a government taking of public land. Do not close or decommission any road. Fix them instead.				
	24, 14, 33, 34	oopposed to all road closure, as a government taking of public land. odo nothing to change or close roads-used or unused--on the Cle Elum Ranger District. Use the money to fix roads.	Address with No Action alternative.		EA page x.
	All road closures would be a government taking of public land. Do not close or decommission any road. Fix them instead.				
	34?	If you can't maintain the roads, that's ok. Just don't close them. Even short spurs are used to camp or park during hunting season.	Add mitigation (require short parking spurs on all decommissioned roads, for dispersed recreation).		EA page x.
	Consider comparative costs of maintaining a road at different management levels, versus decommissioning.				
	39	Address the comparative costs of maintaining a road (at various management levels) vs. closing it or decommissioning it. Cost should be a consideration in the decision, along with other identified factors.	Analysis request: discuss relative costs for road maintenance in Roads Specialist Report.		EA page x.
	To address problems associated with dispersed camping, consider building new campgrounds.				
	21	Until travel management is completed, there is an ongoing opportunity for cross-country travel in all seasons, and with or without snow, this results in lasting impacts to vegetation, soils, and wildlife, in my observation.	Non-issue (observation).		
	Give more consideration to road access needs for recreation, and less priority to road closures and decommissioning.				
	39	Purpose and need places more priority on road closure and decommissioning due to budget constraints, than on considering the need for roads or ways to maintain them or provide access for the recreating public.	Non-issue (opinion) but describe resource benefit ratings under Travel Analysis.		EA page x.
	Proposed commercial harvest in PWA would affect eligibility for wilderness consideration and requires preparation of an EIS.				
	44	harvest in pwa prior to a Forest Plan decision would make it ineligible for consideration as wilderness.	Modify proposed action to exclude PWA and/or allow only NFUB in PWA		EA page x.
	Proposed commercial harvest in PWA is likely to be uneconomical and resulting appeals may delay the project.				
	17	Pre-commercial treatments in the Lion Rock Potential Wilderness Area are likely to be uneconomical and could potentially lead to an appeal. AFRC does support maximum utilization of the land base for commodity production, however, to include these areas and activities might result in significant delays and costs during the project offering period. If the treatment is commercial, however, then AFRC supports it.	Modify proposed action to exclude PWA and/or allow only NFUB in PWA		EA page x.
	Planned road closures will not be effective without increased enforcement.				
	7, 31	oClosing or blocking off roads will not be effective without increased enforcement oHow will Forest Service prevent additional unauthorized use (road and campsite development) and how will it notify users of alternative areas?.	Address with required mitigation (posting of signs).		EA page x.
	Eliminate large gatherings in Dunning Meadows.				
	7	Please restrict access to Dunning Meadows by vehicles and large gatherings. An annual 3-day event there results in permanent user-built trails, sanitation issues, noise, litter, and law enforcement problems. Move it to a more suitable location, such as Haney Meadows.	Non-issue (outside the scope of this project).		
	Notifications are needed.				
	31	How will Forest Service notify dispersed campers that previously open sites are now closed?	Address with mitigation - require posting of some restoration sites.		EA page x.
	35	Adjacent landowner is interested in cooperative mgt. Request 6 mos notice of any road or culvert work affecting their property and 6 mos advance for use of their property or road.	Address with required mitigation (notify landowner of pending actions per request).		EA page x.

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2) Management activities may affect water quality, water quantity, and associated fish habitat.	No need for actions to improve water quality (streams are clean).				
	11, 22	<ul style="list-style-type: none"> Restoration of 66 aquatic sites is unnecessary, as these creeks (Williams and Boulder) have good water quality. Runoff with silt from our roads is not harming fish. On the contrary, I would argue that runoff is acutally a benefit to fish survival as a source for the particular scent that guides fish on their long journey home to spawn. 	Non-issue (opinions). Clarify purpose and need in regard to water quality and fish.		EA page x.
	No need to improve fish habitat -- steelhead do not occur here.				
	4, 8, 16, 19, 20, 29, 33, 42, 44	<ul style="list-style-type: none"> We have never observed steelhead in Williams Creek. Difficult to imagine that more than a couple of the hardiest fish can navigate up streams as small as Williams Creek and similar tributaries. Clarify steelhead habitat. We have observed steelhead in Williams Creek, and have supported restoration efforts for steelhead on our private property. We also support future reintroduction of coho salmon by the Yakama Nation. Lion Gulch is not steelhead habitat, by nature (it disappear in places, in summer). If there, they were recently planted. Swauk Creek and its tributaries provide important habitat for the Upper Yakima steelhead population); purpose and need should reflect importance of floodplain and riparian habitat and restoration here in meeting recovery thresholds. 	Non-issue (opinions, personal observations). Clarify steelhead presence and habitat needs		EA page x.
	Describe how actions will improve 303d listed streams (temperature impaired).				
	44	describe how actions will respond to (improve) 303d listing as temperature impaired.	Non-issue (analysis request, already required)		EA page x.
	Proposed large wood replenishment will cause erosion, damage stream banks, and cause flooding.				
	19, 20	<ul style="list-style-type: none"> Adding wood to streams will cause erosion, and will create problems in the future. Adding wood will cause flooding and damage to stream banks in good snow years. 	Non-issue (opinion), but address effects of large wood onvelocity of flood water and flood potential.		EA page x.
	19	Restoring beaver will cause problems in the future. At trapping school we were told that beavers were historically a big problem for Liberty.	Non-issue (opinion). Active relocation of beaver is not proposed by clarify that natural recolonization is likely to follow large wood replenishment.		EA page x.
3) Management activities may affect northern spotted owl, deer and elk, and carnivores.	No need to address spotted owls. They do not occur here.				
	16, 4, 29	<ul style="list-style-type: none"> Many old timers here have never seen a spotted owl here. We have seen and heard spotted owls in the area. Miners love them because they eat pack rats. They sometimes hang around campgrounds and pick up scraps. They are not too scared of people. spotted owls nest near my mine. 	Non-issue (opinions). Clarify owl presence and recovery needs		EA page x.
	Protection of spotted owls is futile and not supported by science, and inconsistent with other public needs.				
	11, 16	<ul style="list-style-type: none"> Creation of a spotted owl recovery area is inconsistent with the diverse public uses that occur here.. There is a substantial body of information available that presents a strong argument that spotted owl numbers are dwindling in spite of the best efforts by humans, and the reason for this can be summed up as natural selection. Pinning significant portion of the focus of a restoration project on the hope of saving a dommed species would be an inexcusable water of taxpayer funds. I understand that the Forest Service is mandated by a higher authority to manage spotted owls, but it also has a duty to report to citizens and higher authority when the scientific evidence does not support designation of an area as spotted owl habitat. 	Non-issue (opinion, and already decided by the Endangered Species Act and Forest Plan direction); clarify Late Successional Reserve, Critical Habitat, and Recovery Plan requirements..		EA page x.
	Recognize importance of this project in maintaining, protecting, and cultivating spotted owl habitat, and consider a no take alternative. Define high quality habitat, and address source habitat for focal species.				
	44,	add statement to purpose and need recognizing importance of this project in maintaining, protecting, and cultivating spotted owl habitat in Swauk LSR; expect to see a no-take approach, given population declines. Define high quality habitat and appropriate locations. Utilize science behind forest Plan revision to address source habitat (terrestrial wildlife viability assessments, and objectives for source habitats (restoration of habitat and connectivity, protection of existing, and impacts to focal spp).	Consider a "No Take" alternative for spotted owls. Address effects to source habitats.		EA page x.
	Describe impacts to security and core habitats, using zones of influence modeling.				
	44	for all seasons, map and described impacts to security habitat under each alternative, utilizing Gaine et al. zones of influence modelling.	Non-issue (analysis request, already required)		EA page x.

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4) Forest management activities including vegetation treatments, fuels treatments, firewood gathering, and grazing may affect forest health, ecology, and economics.	Give more consideration to economics benefits in Purpose and Need, and design project to show more economic efficiency and benefit.				
	41	Purpose and need does not address the economic aspects of the project. Include an alternative that maximizes the economic benefit to the local community.	Non-issue (already decided by Forest Plan direction).		
	41	Small size of the project area reduces efficiencies and increases analysis costs.	Non-issue (observation). Scope of project determined by ecological factors.		EA page x.
	41	Proposed action does not incorporate all the potential revenue opportunities (high current road densities afford access for additional mechanical harvest).	Non-issue (clarify reasons for selection of treatment areas).		
	Give more consideration to restoration of unique habitats.				
	44	address restoration needs for unique habitats (e.g., reduced conifer encroachment in meadows) (describe impacts to unique habitats);	Non-issue (clarify how proposed non-commercial treatments restore unique habitats (bitterbrush meadows, aspen regeneration)		EA page x.
	Described proposed prescribed burning and management of natural fires.				
	31	How will prescribed burns be accomplished, and how will natural fires be managed?	Non-issue (clarify proposed action in regard to burning).		EA page x.
	Describe effects on use of Swauk Sheep Allotment, and efforts to protect restoration sites.				
	15	The proposed action would affect 10 bed grounds and 7 days of grazing on the Swauk Sheep Allotment. Is there a plan for alternate routing of domestic sheep during project implementation? During the recovery period, how will restoration sites be protected from the public and from livestock grazing? Will there be any hardening of riparian areas for stock watering? How soon after treatments and restoration can regular sheep use resume?	Non-issue (analysis request), and add required mitigation for minimizing impacts to permittee (notification requirements). Request to harden riparian areas for stock watering - no need was identified, therefore request is outside the scope of this project.		EA page x.
	Plans to retain all old trees may reduce health and vigor of surrounding trees, and does not allow for regeneration. Remove some large trees to pay for restoration treatments.				
	17	Retainage of all old trees as defined by VanPelt is in conflict with establishing forest resiliency, because it may not allow for regeneration of seral species, and because some removal of old trees may be essential to protect the health and vigor of other old trees (where old trees are overstocked).	Non-issue (already decided based on LSR objectives).		
	17	Retainage of all old trees may also be in conflict with the stated purpose and need for maintenance of infrastructure, because a portion of the product to be harvested should be larger trees to fund this restoration project and maintenance of infrastructure.	Non-issue (already decided by LSR standards and guidelines).		
	17	Proposed hand-piling around legacy trees will be expensive . Consider less costly treatments or allow this dead and down material to decay naturally.	Address with No Action Alternative.		EA page x.
	2	The project is predisposed by wording in the purpose and need to reject any alternatives that don't entail logging. Legitimate project goals will never be achieved (and may be harmed) by commercial logging. Remove from Purpose and Need the goal to "provide forest products at an acceptable ecological and economic scale".	Consider an alternative that does not entail commercial harvest.		EA page x.
	Intent of project is to fix something that is not broken, and will create industrial tree farm conditions. Will eliminate natural disturbances that benefit many natural resources.				
	2	Based on stated goals, this project is intended to fix something that isn't broken, will create private industrial tree farm conditons, and eliminate natural disturbances that are supposed to kill trees and simultaneously benefit many other natural resources in the forest.	Non-issue (opinion). Clarify ecological need for treatment, and required mitigations that maintain natural processes.		
	Large timber (trees) are irreplaceable. Limit fire potential to protect this resource.				
	21	LSR large timber is an irreplaceable resource -- important to limit fire potential in the project area to protect this resource.	Non-issue (already protecting large old trees).		
	Treatments will fail to eradicate spruce budworm.				
	26.5	Scrap the project and develop a more reasonable plan to eradicate spruce budworm, which has become the main issue of the forest supervisor's or District Ranger's policy of "letting nature take its course" for 12 years.	Non-issue (opinion)		

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5) Planned use of herbicides poses a human health risk and may kill fish, birds, and mammals.	Proposed use of glyphosate poses a human health risk and may kill wildlife and fish.				
	2	Proposed use of glyphosate poses a human health risk, and may kill fish, birds, and mammals (including humans).	Non-issue (already decided under 2005 Invasives ROD.		
6) Procedural issues, requests for clarification.	Address timelines and sequencing for various actions, and sufficiency of funds to accomplish work.				
	13, 16	Include a project timeline, discussion of how various activities would be sequenced and coordinated, associated costs, and sufficiency of available funding to accomplish the project. What is the contingency plan to protect treatment areas that will take several years to accomplish?	Non-issue (analysis request). Describe planned sequencing for hill climb restoration, post-burn aspen exclosures, and post-burn suspension of sheep-grazing.		EA page x.
	Maps used for scoping were inadequate (inaccurate, missing routes, confusing because actions on dual use roads appear to affect use as trails, did not distinguish proposed routes).				
		<ul style="list-style-type: none"> map incorrectly shows 9712113 as ML2 open to high clearance vehicles. It's already closed at the Lion Gulch Creek crossing. map does not show the Hole in the rock trail (4WD334) that runs between 971200 and 9718000; map is missing center connection between the two ends of 9718112 and a connection between 9712113 and 9718112; The scoping map was difficult to understand; scoping map is confusing in regard to trails. Proposed road actions look like they are decommissioning underlying trails, and the general public will not know which is which, so be prepared. Also, need to distinguish proposed reroutes from existing routes, including 4WD319 (shown incorrectly on map?) and 4WD332. Show northern part of the 9712-113 as "convert to trail" rather than "put in long-term storage with no use" because it is part of the 4WD 332. 	Non-issue (but correct inaccuracies and use multiple maps to display different types of road and trail actions.		EA page x.
	The scoping opportunity was too short, and occurred when many users (including miners) were away for the winter.				
		<ul style="list-style-type: none"> The scoping comment period is too short, and occurred at a time when many users of the area (including miners) are away for the winter. They should be given an opportunity to comment. Extend the comment period. Many people of the community still don't know about the project. Scoping period was too short. 	Non-issue. Describe search of tax roles for scoping notice to seasonal residents;		EA page x.
	The scoping letter was not specific enough to evaluate effects to recreation and was difficult to understand.				
	4, 10, 11, 16, 18, 25, 26, 28, 30, 32, 39, 43	<ul style="list-style-type: none"> The proposal does not present enough specific information to determine how and where restoration actions will impact existing camping areas, and horseback, 4WD, and other trails, therefore, it is difficult for the public to provide meaningful input on the project. The verbiage used in scoping is too difficult for the general public to understand, and discouraged public response. Thank you for the opportunity to comment. I appreciate the easily understood language and comprehensive maps provided. Scoping letter was unclear as to plans for snowmobile trails, and actions that would affect grooming and parking. Cannot tell from map how project will impact winter trails. not enough information provided about proposed closure and return to nature of 9718-118; need more clarity on proposed road closures around LMOA 	Non-issue, address with clarifications; address impacts to winter and summer trails and camping areas; eliminate jargon;		EA page x.
	Address problems associated with dispersed camping, consider building new campgrounds.				
	18	Proposed action does not address problems associated with dispersed campgrounds (for example, sanitation, illegal shooting, increased fire risk from campfires, soil compaction—as observed in North Fork Teanaway); consideration should be given to creating more developed campgrounds as an alternative to dispersed camping.	Non-issue (outside the scope of this project. There are no funds to build new campgrounds).		EA page x.